



Response to query regards ongoing use and compliance of alcohol breathalysers compliant prior to June 2022

The previous Alcohol breathalyser Standards (personal use) often cited in workplace policies as a standard of “fit for purpose” (durability, accuracy and performance) required for Workplace alcohol testing AS3547:1997 has been updated to AS3547:2019. NZ has no comparable Standards so this is often referenced in workplace drug and alcohol policies to describe what device will be used when testing for alcohol in the workplace.

Q: Do I need to upgrade or replace my existing alcohol breathalyser to one that is certified to the new AS 3547:2019?

Instruments that were sold as certified products under AS3547:1997, are and continue to be certified to AS3547:1997 and remain fit for purpose* (see below things to consider in your policy). Nothing will change this, they are certified to the/a standard which provides assurances of a standard of accuracy and fit for purpose. If they are calibrated according to the manufacturer's specifications, then they will continue to operate as products certified to AS3547:1997 and remain accurate and sensitive, robust and fit for purpose.

Q: My supplier has told me they will not continue to service and calibrate my existing breathalyser.

All reasonable manufacturers and suppliers will or should continue to provide service, repair & calibration for products they sold. This includes calibration services for AS3547:1997 certified equipment. Inscience will continue to service and support our AS3547:1997 compliant breathalysers as long as you want.

Q: Why is this being pushed now and I am being asked to upgrade to a new model of Breathalyser?

AS3547:2019 was given 3 years before it came into play giving manufacturers time to get new models certified to this standard which can be a lengthy with high costs associated.

After 28/June/2022, the AS3547:2019 will come into full effect obligating manufacturers to achieve certification on all new models. This means that certifiers such as SAI Global will no longer certify new products to AS3547:1997. After 28/June, only product compliant to the 2019 version will be advertised for sale as certified. Manufacturers can and may still claim their product is compliant, but it will not be sold as certified.

Q: Does this mean my existing breathalyser isn't fit for purpose or that I need to replace it?

This latest Standard, in my opinion, makes your existing alcohol breathalyser no less useful and applicable in your workplace but needs to be considered when replacing your current breathalyser when the time comes for whatever reason that applies i.e., lost, stolen, broken, worn out. Breathalysers certified to the new Standards may be no more robust and reliable products and those

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older breathalysers may also be able to comply with the latest 2019 standards but no manufacturer will embark upon paying for old models to be certified for obvious reasons.

AS3547:2019 is a more robust and exacting standard than the 1997 version. It contains substantially more tests and validation to ensure that the instrument operates accurately in a much wider range of conditions. During the transition period over the past 3 years, consumers have had the choice to purchase either 1997 or 2019 compliant equipment. Given the choice, many consumers have already elected to purchase those breathalysers compliant to the new standard.

Q: What changes would the AS 3547:2019 mean for my Policy document?

Another issue to be mindful of is company/workplace drug and alcohol policies. Some companies' workplace policies refer to no specific version of AS3547, or state that "subsequent revisions" will apply/infering the latest is to be used. This may require a change to update your company policy to accommodate your choices. If you have AS3547:1997 stated as the benchmark, with no mention of subsequent revisions then your policy needs no updating unless you want to or you choose to replace your breathalyser(s). When you do upgrade to a new Breathalyser you can at that point update the reference to the AS3547 :2019 version of the Standard.

Of course, new models of Breathalysers will have more features such as annual calibration periods and this spells better more durable sensors certified to the new AS3547:2019 but you may continue to use the breathalyser you have already invested in until such time as you need or choose to upgrade. It is up to each individual company to determine the best way to meet their OH&S programs. There is no need to throw out older 1997 compliant and certified equipment just make sure your policy reflects what you choose to do and update it if any changes in your equipment or processes are required.

Q: Anything else I might need to consider in my policy?

Lastly, with respect to the NZ units of measure. Unfortunately, AS3547:2019 states in the very first clause of the standard.

Section 2.1 "The device shall read in grams of alcohol per 210 litres (L) of exhaled breath, i.e. g/210L."

This is the Australian standard measurement units so when you reference the AS3547:2019 standards and you want to retain the NZ measurement units of micrograms per litre(ug/l of breath) which we all more easily relate to from our NZTA levels of alcohol, then you will need to state that in your policy as a deviation from the AS3547:2019 alternatively change your policy measurement unit to the Australian g/210L unit of measure. All our (Inscience supplied) breathalysers and most modern breathalysers available have the ability to easily select alternatives in measurement units on each device.

If you require any support of changes you may want to consider when updating Workplace Drug and Alcohol policy, no matter how small the change, we are available and happy to help you.